

**LAQUER URBAN CLIFFORD & HODGE LLP**

Susan Graham Lovelace, State Bar No. 160913

*Email: Lovelace@luch.com*

Andrew Quinn Thompson, State Bar No. 340286

*Email: AThompson@luch.com*

200 South Los Robles Ave., Suite 500

Pasadena, California 91101-2432

Telephone: (626) 449-1882 / Facsimile: (626) 449-1958

Counsel for Plaintiffs, Trustees of the Southern California  
IBEW-NECA Pension Plan, et al.

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

TRUSTEES OF THE SOUTHERN  
CALIFORNIA IBEW-NECA PENSION  
PLAN, TRUSTEES OF THE  
SOUTHERN CALIFORNIA IBEW-  
NECA DEFINED CONTRIBUTION  
TRUST FUND, TRUSTEES OF THE  
SOUTHERN CALIFORNIA IBEW-  
NECA HEALTH TRUST FUND,  
TRUSTEES OF THE SOUTHERN  
CALIFORNIA IBEW-NECA  
SUPPLEMENTAL UNEMPLOYMENT  
BENEFIT TRUST FUND, TRUSTEES  
OF THE LOS ANGELES COUNTY  
ELECTRICAL EDUCATIONAL AND  
TRAINING TRUST FUND, TRUSTEES  
OF THE NATIONAL ELECTRICAL  
BENEFIT FUND, TRUSTEES OF THE  
SOUTHERN CALIFORNIA IBEW-  
NECA LABOR-MANAGEMENT  
COOPERATION COMMITTEE,  
TRUSTEES OF THE NATIONAL  
NECA-IBEW LABOR-MANAGEMENT  
COOPERATION COMMITTEE TRUST  
FUND, CONTRACT COMPLIANCE  
FUND, LOS ANGELES ELECTRICAL  
WORKERS CREDIT UNION, and  
SOUTHERN CALIFORNIA IBEW-  
NECA ADMINISTRATIVE  
CORPORATION,

Plaintiffs,  
vs.

CALIFORNIA STREET LIGHTING, a  
California corporation,

Defendant.

CASE NO.: 5:23-cv-2012-WLH-DTB

ASSIGNED TO THE HONORABLE  
WESLEY L. HSU

**NOTICE OF MOTION AND  
MOTION FOR DEFAULT  
JUDGMENT**

[Fed. R. Civ. Proc. 55(b)(2)]

**FILED SEPARATELY,  
CONCURRENTLY AND IN  
SUPPORT THEREOF:**

- 1. MEMORANDUM OF POINTS  
AND AUTHORITIES;**
- 2. DECLARATION OF IGAL  
KHOSHELESAN;**
- 3. DECLARATION OF RAUL  
RODRIGUEZ;**
- 4. DECLARATION OF  
ANDREW Q. THOMPSON;  
and**
- 5. [PROPOSED] JUDGMENT**

Hearing Information:

Date: March 15, 2024

Time: 1:30 p.m.

Ctrm: 9B, 9th Floor

1 TO THE HONORABLE WESLEY L. HSU AND THE CLERK OF THE UNITED  
2 STATES DISTRICT COURT, CENTRAL DISTRICT, AND DEFENDANT,  
3 CALIFORNIA STREET LIGHTING:

4 **PLEASE TAKE NOTICE** that on March 15, 2024, at 1:30 p.m., or as soon  
5 thereafter as counsel may be heard, Plaintiffs, Trustees of the Southern California  
6 IBEW-NECA Pension Plan, et al., will, and hereby do, move the Court in Courtroom  
7 9B of the First Street Courthouse, located at 350 W. 1<sup>st</sup> Street, Los Angeles, CA  
8 90012, before the Honorable Wesley L. Hsu, United States District Judge, for entry of  
9 default judgment in favor of Plaintiffs and against California Street Lighting, a  
10 California corporation, for the principal amount of \$92,934.70, exclusive of attorneys'  
11 fees and costs.

12 This motion will be made on the grounds that the Complaint in this action was  
13 filed on October 2, 2023. [Dkt. 1.] The Summons and Complaint were served on  
14 Defendant, California Street Lighting, a California corporation, on October 20, 2023.  
15 The Declaration of Service was filed by Plaintiffs on October 25, 2023. [Dkt. 7.] No  
16 answer or other response to the Complaint has been filed, and Defendant's default was  
17 entered in the Civil Docket in the office of the Clerk of this Court on December 11,  
18 2023. [Dkt. 12.] No proceedings have been taken by Defendant to set aside the  
19 default.

20 This motion does not seek a default judgment against an infant or incompetent  
21 person, nor does the Soldiers' and Sailors' Relief Act of 1940 or the Servicemembers'  
22 Civil Relief Act apply in this action.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 This motion will be based on this notice of motion and motion, the declarations  
2 of Raul Rodriguez, Igal Khoshelesan, and Andrew Q. Thompson, the memorandum of  
3 points and authorities filed herewith, the proposed judgment lodged herewith, and on  
4 all the pleadings and documents on file herein.

5  
6 DATED: February 7, 2024

LAQUER, URBAN, CLIFFORD & HODGE LLP

7 By: /s/ - Andrew Q. Thompson

8 Andrew Q. Thompson  
9 Counsel for Plaintiffs, Trustees of the Southern  
10 California IBEW-NECA Pension Plan, et al.